

EXHIBIT C - 1

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
JAMES W. BRANNAN, as the Personal Representative of the
Estate of Robert Indiana,

Index No.: 653809/2019

Petitioner,

Motion Sequence 001

- against -

MICHAEL MCKENZIE and
AMERICAN IMAGE ART,

**AFFIDAVIT OF CLARA
CARUSO RODRIQUEZ IN
OPPOSITION TO MOTION
FOR INJUNCTIVE RELIEF**

Respondents.

-----X
STATE OF NEW YORK)
 ss)
COUNTY OF WESTCHESTER)

CLARA CARUSO RODRIQUEZ, being duly sworn deposes and says as follows:

1. I make this Affidavit in connection with the opposition of Respondents Michael McKenzie and American Image Art (collectively "American Image") in the above captioned action. I am a resident of Dutchess County, State of New York.
2. I am employed as a printer for American Image in Katonah, New York and have been so since 2014. I have an undergraduate degree from SUNY Purchase where I majored in print making.
3. I have traveled to Vinalhaven, Maine no less than three (3) times since 2014 and have been at the Star of Hope studio of Robert Indiana in Vinalhaven at least twice, all for the purpose of helping to coordinate meeting with Mr. Indiana and to photograph the signing by Mr. Indiana of the silk screen prints that we created and made at the American Image studio.

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4. I have personally witnessed Robert Indiana at his home studio in Vinalhaven, Maine sign his name with a pencil to our silkscreen prints of "HE" and of "SHE" and of a "HOPE" calendar. I have also personally witnessed Mr. Indiana signing "The Retrospective" giclee, and limited edition prints American Image made with the theme Bob Dylan, Like a Rolling Stone suite.
5. I made such observations in Vinalhaven in the presence of Michael McKenzie, and Jamie Thomas who I understood to be a close caretaker for Mr. Indiana.

Dated: New York, New York
August 14, 2019


Clara Caruso Rodriguez

Sworn to before me this 14
Day of August 2019



Notary Public

JOHN B SIMONI JR
Notary Public, State of New York
No. 02SI5042624 NY
Qualified in Nassau County
Commission Expires April 24, 20 23